

Exhibit C

Kyle J. Meyer

From: Kyle J. Meyer
Sent: Tuesday, February 13, 2024 8:57 AM
To: George R. Farneth
Cc: Chilson, Dana; Schwartz, Edwin; Gregory Miller; Alexa Gervasi; Gina A. Russell; Savannah Caruso; James W. Kraus
Subject: RE: Hutcherson v PIAA, et al.

Since your claims against Buchanan have not materially changed, the Motion will say pretty much the same thing as the last Motion. If you are not willing to reconsider your claims, there is no reason to have a discussion.

Kyle J. Meyer

Counsel

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kyle.meyer@bipc.com

Buchanan

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From: George R. Farneth <grf@farnethlaw.com>
Sent: Tuesday, February 13, 2024 7:14 AM
To: Kyle J. Meyer <kyle.meyer@bipc.com>
Cc: Chilson, Dana <DChilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Savannah Caruso <smc@farnethlaw.com>; James W. Kraus <jkraus@krausjenkins.com>
Subject: Re: Hutcherson v PIAA, et al.

—

Since you are filing the Motion and know what it will allege, I will let you decide.

Sent from my Verizon, Samsung Galaxy smartphone
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From: Kyle J. Meyer <kyle.meyer@bipc.com>
Sent: Monday, February 12, 2024 9:50:35 PM
To: George R. Farneth <grf@farnethlaw.com>
Cc: Chilson, Dana <DChilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Savannah Caruso <smc@farnethlaw.com>; James W. Kraus <jkraus@krausjenkins.com>
Subject: RE: Hutcherson v PIAA, et al.

George:

I am speaking solely on behalf of my own client, but I don't think we need to speak unless you believe there is something meaningful for us to discuss. Since Plaintiff's claims against Buchanan have not materially changed, however, the parties appear to be in the same position as when we filed the last Motion to Dismiss (*i.e.*, Buchanan asserting that Plaintiff's claims are deficient and Plaintiff not willing to withdraw his claims despite the deficiencies identified by Buchanan). Nevertheless, if you believe my assessment of the situation is wrong or your client is willing to voluntarily withdraw claims against Buchanan, I am happy to jump on a call at whatever time you can make yourself available tomorrow. Short of that, however, I do not think a call will be necessary.

Kyle

Kyle J. Meyer

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From: George R. Farneth <grf@farnethlaw.com>

Sent: Monday, February 12, 2024 9:12 PM

To: Kyle J. Meyer <kyle.meyer@bipc.com>

Cc: Chilson, Dana <DChilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Savanah Caruso <smc@farnethlaw.com>; James W. Kraus <jkraus@krausjenkins.com>

Subject: RE: Hutcherson v PIAA, et al.

Tomorrow I will be traveling to Rochester, NY for meetings and depositions the rest of the week. What time are you proposing to speak?

George R. Farneth II, Esquire

Founder & Partner

The Farneth Law Group, LLC



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From: Kyle J. Meyer <kyle.meyer@bipc.com>

Sent: Monday, February 12, 2024 8:50 PM

To: George R. Farneth <grf@farnethlaw.com>

Cc: Chilson, Dana <DChilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Savanah Caruso <smc@farnethlaw.com>; James W. Kraus <jkraus@krausjenkins.com>

Subject: RE: Hutcherson v PIAA, et al.

George:

Having reviewed the Amended Complaint, we do not believe that Plaintiff has cured the deficiencies identified in Buchanan's Motion to Dismiss the Original Complaint. Accordingly, we intend to file another Motion to Dismiss raising most (if not all) of the same arguments tailored, as necessary, to the amended pleading. Please let me know by 3:00 p.m. tomorrow whether your client is willing to change his position and agree to voluntarily withdraw all or some of the claims against Buchanan. I am happy to jump on a call tomorrow should you want to discuss.

Kyle

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From: Kyle J. Meyer

Sent: Thursday, December 14, 2023 12:39 PM

To: George R. Farneth <grf@farnethlaw.com>

Cc: Chilson, Dana <DCilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; rrepak@dmkcg.com; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Smc@farnethlaw.com; James W. Kraus <jkraus@krausjenkins.com>

Subject: RE: Hutcherson v PIAA, et al.

George:

As I indicated during yesterday's meet and confer, my client Buchanan Ingersoll & Rooney ("BIR") is similarly situated to McNees Wallace & Nurick ("MWN") with respect to the claims asserted and, in that regard, BIR's positions regarding the deficiencies in Plaintiff's Complaint are materially the same as those set forth in Attorney Kraus's earlier letter on behalf of MWN, which is attached for convenience. For those non-exhaustive reasons, the Complaint does not state any plausible claim for relief against BIR, nor do we believe it could be credibly amended to do so. While we welcome your response and further dialogue, the timing dictates that we

must proceed with preparing our papers so that they are ready to be filed by the applicable deadline should you and your client fail to take meaningful corrective action before then.

Best,

Kyle

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From: James W. Kraus <jkraus@krausjenkins.com>

Sent: Thursday, December 14, 2023 10:09 AM

To: George R. Farneth <grf@farnethlaw.com>

Cc: Chilson, Dana <DChilson@mcneeslaw.com>; Schwartz, Edwin <ESchwartz@mcneeslaw.com>; Gregory Miller <gregory.miller@bipc.com>; Kyle J. Meyer <kyle.meyer@bipc.com>; rrepak@dmkcg.com; Alexa Gervasi <agervasi@krausjenkins.com>; Gina A. Russell <grussell@krausjenkins.com>; Smc@farnethlaw.com

Subject: Hutcherson v PIAA, et al.

Good Morning George. As follow-up to our meet and confer yesterday, I am attaching a letter providing our position regarding the claims you have made against McNees. Thank you. Jim

James W. Kraus

KRAUS JENKINS

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